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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff;

vs.

GLEN HUNSBERGER et al,

Defendants.

CASE NO.: 2:14-cr-328-KJD-NJK

**STIPULATION TO EXTEND MOTIONS  
DEADLINE AND PROPOSED ORDER**

**IT IS HEREBY STIPULATED AND AGREED** by and between the United States of America, by and through Assistant United States Attorney Robert Knief of the United States Attorney's Office for the District of Nevada; defendant Glen Hunsberger, by and through his attorney of record, Kathleen Bliss, Esq., of the law firm Kathleen Bliss Law PLLC; defendant Manuelle Alkeine, by and through his attorney of record, Terrence Jackson, Esq., of the Law Office of Terrence M. Jackson; defendant Jennifer Peskett, by and through her attorney of record, Monique Kirtley, Esq., of the Federal Public Defender's Office; defendant Jason Monteiro, by and through his attorney Brian Smith, Esq., of the Law Office of Brian J. Smith, Ltd.; and defendant Anthony Navarro, by and through his attorney Gabriel Grasso, Esq., of the law firm Gabriel L. Grasso, P.C., that the current motions deadline be extended by an additional 21 days, to August 22, 2016. This stipulation is entered into and based upon the following:

1. The current motions deadline is August 1, 2016. **ECF No. 160.** Trial is set for September 26, 2016. **ECF Nos. 173-177.**

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2. The government filed a second superseding indictment as to all defendants on June 14, 2016. **ECF No. 161.**
3. The government has since produced, and continues to produce, additional discovery. Defendants and their counsel require sufficient time to thoroughly review the new discovery before filing anticipated motions related to the same.
4. A Massachusetts state court recently issued an order suppressing evidence obtained in Massachusetts, which also serves as a basis for charges in this case. This ruling may impact the disposition of this matter.
5. The parties do not anticipate that an extension of the motions deadline will interfere with the current trial setting on September 26, 2016. This stipulation is entered into in good faith and not for purposes of delay.

DATED this 29th day of July 2016.

By: /s/ Robert Knief  
Robert Knief  
Attorney for the United States

By: /s/ Brian Smith  
Brian Smith, Esq.  
Attorney for Jason Monteiro

By: /s/ Kathleen Bliss  
Kathleen Bliss, Esq.  
Attorney for Glen Hunsberger

By: /s/ Gabriel Grasso  
Gabriel Grasso, Esq.  
Attorney for Anthony Navarro


By: /s/ Monique Kirtley  
Monique Kirtley, Esq.  
Attorney for Jennifer Peskett

### **ORDER**

Based upon the stipulation of counsel, and good cause appearing, IT IS HEREBY ORDERED that the current motions deadline be extended an additional 21 days. The parties shall file any pre-trial motions on or before August 22, 2016.

IT IS SO ORDERED.

Dated this 8th day of August 2016.

  
Kent J. Dawson  
United States District Judge